

EXHIBIT E

From: Priselac, Jessica
Sent: Friday, December 4, 2020 4:50 PM
To: 'Christopher Geddis' <CGeddis@mazieslater.com>
Cc: Valsartan PEC <valpec@kirtlandpackard.com>; Goldberg, Seth A. <SAGoldberg@duanemorris.com>
Subject: RE: Valsartan - API Manufacturer and Finished Dose Manufacturer Defendants' Deficient Insurance Disclosures

Chris,

ZHP (and the other Manufacturer Defendants) are not required to produce indemnification agreements with any entity other than "an insurance business" as part of their insurance disclosures. As your November 17, 2020 letter acknowledges, Fed. R. Civ. P. 26(a)(1)(A)(iv) requires the production of "any insurance agreement under which *an insurance business* may be liable . . . to indemnify or reimburse for payments made to satisfy the judgment." Further, as your letter acknowledges, the Court's orders on this issue expressly incorporate Rule 26. See ECF 98; ECF 120.

We are checking as to whether there are any updates to our prior disclosures. To the extent there are any updates, they will be limited to the disclosures that are required under Rule 26 and the Court's prior order.

Best regards,

Jessica

Jessica Priselac
Attorney at Law

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From: Christopher Geddis <CGeddis@mazieslater.com>
Sent: Thursday, December 3, 2020 8:14 PM
To: Priselac, Jessica <JPriselac@duanemorris.com>; Goldberg, Seth A. <SAGoldberg@duanemorris.com>
Cc: Valsartan PEC <valpec@kirtlandpackard.com>
Subject: RE: Valsartan - API Manufacturer and Finished Dose Manufacturer Defendants' Deficient Insurance Disclosures

Jessica,

The ZHP entities have not produced any indemnification agreements relevant to this litigation. Per Plaintiffs' November 17, 2020 letter, please advise when the ZHP entities will produce these agreements.

Best,
Chris

From: Priselac, Jessica <JPriselac@duanemorris.com>
Sent: Wednesday, December 2, 2020 10:16 AM
To: Christopher Geddis <CGeddis@mazieslater.com>; Goldberg, Seth A. <SAGoldberg@duanemorris.com>
Cc: Valsartan PEC <valpec@kirtlandpackard.com>
Subject: RE: Valsartan - API Manufacturer and Finished Dose Manufacturer Defendants' Deficient Insurance Disclosures

Chris,

We have asked the other manufacturer defendants to respond directly to you. For the ZHP entities, can you please tell us what, if any, deficiencies you have identified?

Thank you,

Jessica

Jessica Priselac
Attorney at Law

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From: Christopher Geddis <CGeddis@mazieslater.com>
Sent: Tuesday, December 1, 2020 12:26 PM
To: Goldberg, Seth A. <SAGoldberg@duanemorris.com>
Cc: Priselac, Jessica <JPriselac@duanemorris.com>; Valsartan PEC <valpec@kirtlandpackard.com>
Subject: RE: Valsartan - API Manufacturer and Finished Dose Manufacturer Defendants' Deficient Insurance Disclosures

Counsel,

We have not heard from you regarding Plaintiffs' November 17, 2020 letter. As a result, we will place API Manufacturer and Finished Dose Manufacturer Defendants' deficient insurance disclosures on the agenda for next week's Status Conference. Please let us know if you like to discuss this issue before then.

Best,
Chris

From: Christopher Geddis
Sent: Tuesday, November 17, 2020 12:28 PM
To: Goldberg, Seth A. <SAGoldberg@duanemorris.com>
Cc: Priselac, Jessica <JPriselac@duanemorris.com>; Valsartan PEC <valpec@kirtlandpackard.com>
Subject: Valsartan - API Manufacturer and Finished Dose Manufacturer Defendants' Deficient Insurance Disclosures

Counsel,

Please see attached for Plaintiffs' letter regarding API Manufacturer and Finished Dose Manufacturer Defendants' deficient insurance disclosures.

Best,
Chris

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